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18 UNITED HEALTHCARE INSURANCE COMPANY
19 and UNITED BEHAVIORAL HEALTH

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH, and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED HEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**DECLARATION OF GEOFFREY SIGLER
IN SUPPORT OF DEFENDANTS UNITED
HEALTHCARE INSURANCE COMPANY'S
AND UNITED BEHAVIORAL HEALTH'S
OPPOSITION TO PLAINTIFFS' MOTION
FOR SUMMARY ADJUDICATION**

1 I, Geoffrey Sigler, state and declare as follows:

2 1. I am a partner at Gibson, Dunn & Crutcher LLP, and counsel of record for Defendants
3 United Healthcare Insurance Company (“UHC”) and United Behavioral Health (“UBH”) in the
4 above-captioned case. I have personal knowledge of the facts set forth in this Declaration, and, if
5 called as a witness, could and would testify competently to such facts under oath.

6 2. I submit this declaration in support of Defendant UHC’s and UBH’s Opposition to
7 Plaintiffs’ Motion for Summary Adjudication. All of the documents discussed below were received
8 by my firm from UHC and UBH, and produced by my firm to Plaintiffs in discovery in this litigation.

9 3. To protect the privacy of Plaintiffs, where documents are specific to certain Plaintiffs,
10 I refer to each Plaintiff below as they are referred to in the *LD* Complaint, rather than using their real
11 names. Unredacted versions of these exhibits have been lodged with the Court as part of UHC’s and
12 UBH’s Administrative Motion to Seal and the accompanying declaration of Lauren M. Blas.

13 4. Attached hereto as **Exhibit A** is a copy of the unsigned Administrative Services
14 Agreement between Tesla, Inc. and United HealthCare (UHC), bearing Bates numbers
15 UHC000008389 to UHC000008499. This document is being submitted as a supplement to the
16 redacted version of this document that Plaintiffs filed with their opening brief.

17 5. Attached hereto as **Exhibit B** is a compilation of the 10th, 11th, and 13th Amendments
18 of the Administrative Services Agreements between Apple, Inc. and United HealthCare (UHC),
19 bearing Bates numbers UHC000007733 to UHC000007779; UHC000007807 to UHC000007872;
20 and UHC000007873 to UHC000007958. This document is being submitted as a supplement to the
21 Apple-UHC Administrative Services Agreement that Plaintiffs filed with their opening brief.

22 6. Attached hereto as **Exhibit C** is the Summary Plan Description for Tesla, Inc. PPO
23 Plus Plan, dated January 1, 2021 and bearing Bates numbers UBH000354 to UBH000600.

24 7. Attached hereto as **Exhibit D** is BW’s Explanation of Benefits (“EOB”), dated
25 January 27, 2020 and bearing Bates numbers UHC000003510 to UHC000003516.

26 8. Attached hereto as **Exhibit E** is an appeal letter from UnitedHealthcare to Plaintiff
27 BW, dated April 7, 2020 and bearing Bates numbers UHC000005349 to UHC000005355.

1 9. Attached hereto as **Exhibit F** is DB's EOB, dated January 30, 2019 and bearing Bates
2 numbers UHC000001708 to UHC000001712.

3 10. Attached hereto as **Exhibit G** is a compilation of appeal letters from UnitedHealthcare
4 to Plaintiff DB. These letters are dated March 19, 2020, May 28, 2020, June 11, 2020, and
5 September 9, 2019 (bearing Bates numbers UHC000006311 to UHC000006330), as well as May 29,
6 2020, April 8, 2020, and September 10, 2019 (bearing Bates numbers UHC000006341 to
7 UHC000006357).

8 11. Attached hereto as **Exhibit H** is LD's EOB, dated August 13, 2019 and bearing Bates
9 numbers UHC000003150 to UHC000003159.

10 12. Attached hereto as **Exhibit I** is a compilation of appeal letters from UnitedHealthcare
11 to Plaintiff LD. These letters are dated May 29, 2020, April 2, 2020, April 3, 2020 and September 9,
12 2019 (bearing Bates numbers UHC000006711 to UHC000006724); as well as May 27, 2020 and
13 May 28, 2020 (bearing Bates numbers UHC000006739 to UHC000006744), and June 16, 2020 and
14 March 23, 2020 (bearing Bates numbers UHC000006754 to UHC000006770).

15 13. Attached hereto as **Exhibit J** is RH's EOB, dated August 27, 2019 and bearing Bates
16 numbers UHC000004420 to UHC000004424.

17 14. Attached hereto as **Exhibit K** is an appeal letter from UnitedHealthcare to Plaintiff
18 RH, dated April 7, 2020 and bearing Bates numbers UHC000007122 to UHC000007126.

19 15. Attached hereto as **Exhibit L** is CJ's EOB, dated April 30, 2019 and bearing Bates
20 numbers UHC000006056 to UHC000006061.

21 16. Attached hereto as **Exhibit M** is the 2018 Benefits Book for Apple, Inc., bearing Bates
22 numbers UBH000001 to UBH000353.

23 17. Attached hereto as **Exhibit N** is the 2019 Benefits Book for Apple, Inc., bearing Bates
24 numbers UBH000601 to UBH000951.

18. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: October 27, 2021

GIBSON, DUNN & CRUTCHER LLP

By: Geoffrey M. Sigler
Geoffrey Sigler